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August 1, 2017

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Hon. Victor Marrero  
United States District Judge  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

USDC SDNY  
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Re: Xiang v. Inovalon Holdings, Inc., No. 1:16-cv-04923 (VM)

Dear Judge Marrero:

We represent defendants Citigroup Global Markets, Inc., Goldman Sachs & Co. LLC, Merrill Lynch, Pierce, Fenner & Smith Incorporated, Morgan Stanley & Co. LLC, and UBS Securities LLC in the above-referenced action (the “Underwriter Defendants”). I am writing to request an order directing the Clerk of the Court to modify the caption and docket in this matter to remove several other underwriters that originally were named as defendants but that are not named in lead plaintiff’s consolidated amended complaint. Neither lead plaintiff nor the other defendants object to the relief requested in this letter.

The defendants named in the initial complaint included nine alleged underwriters of the initial public offering of Inovalon Holdings, Inc. In addition to the five firms that remain as defendants, the originally named underwriter defendants included (i) Piper Jaffray & Co., (ii) Robert W. Baird & Co. Incorporated, (iii) Wells Fargo Securities, L.L.C, and (iv) William Blair & Company, L.L.C. These four defendants were not named as defendants in lead plaintiff’s amended complaint, but they were still included in the caption of that pleading. See Amended Complaint, cover & ¶ 10 [Doc. No. 66]. We have been advised by the Clerk of the Court’s staff that because these former defendants are still listed in the caption of that amended pleading, the Clerk’s office cannot modify the caption or the docket to reflect that those entities are no longer parties without an order to that effect from this Court.



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For these reasons, the Underwriter Defendants respectfully request an order directing the Clerk of the Court: (i) to revise the caption in this action to remove the names of Piper Jaffray & Co., Robert W. Baird & Co. Incorporated, Wells Fargo Securities, LLC, and William Blair & Company, L.L.C. from the list of defendants; and (ii) to note on the docket that each of those entities has been terminated from the action.

Respectfully submitted,

A handwritten signature of John J. Clarke, Jr.

John J. Clarke, Jr.

cc.: All Counsel of Record (By Email)

**SO ORDERED.** Request GRANTED. The Clerk of Court is directed to amend the caption of this case to remove the defendants specified above. / /  
DATE 8-2-17 VICTOR MARRERO, U.S.D.J.